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23 UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF
27 GOVERNMENT EMPLOYEES, AFL-CIO, et
28 al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF FRANCESCA
WANDER**

DECLARATION OF FRANCESCA WANDER

I, Francesca Wander, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief. I am providing this declaration in my capacity as a Union member.

2. I am a member of Service Employees International Union (SEIU) Local 1000 and an elected member of the Unit 1 Bargaining Unit Negotiating Committee (BUNC). Unit 1 is comprised of state employees who provide professional administrative, financial, and staff services, including accounting officers, auditors, and departmental analysts for all state departments, employment program representatives at the Employment Development Department (EDD), disability evaluators at the Department of Health and Human Services (DHS), and information technology analysts. Approximately 60,000 Unit 1 members live and work throughout the state—from the U.S.-Mexico border to the Oregon state line. Unit 1 members are essential to maintaining the efficiency and effectiveness of operations across state departments and providing services that Californians rely on every day. I have been a California State employee for five years, an SEIU Local 1000 member for two years, and a BUNC member for a year.

3. I am employed by the California Department of Housing and Community Development (HCD). HCD provides affordable housing to veterans, seniors, young families, farm workers, tribes, people with disabilities, and unhoused individuals and families. I have been employed by HCD for five years.

4. There are five divisions of HCD whose missions are dedicated to housing policy and legislation and to the delivery of affordable housing to Californians, in both dense high-resource urban areas as well as in often significantly underserved and under-resourced rural areas. My division, the Division of Federal Financial Assistance (DFFA), administers the state's federally funded affordable housing programs, with funding allocated exclusively by the U.S. Department of Housing and Urban Development (HUD).

1 5. As an HCD Program Representative II, I am responsible for overseeing projects
2 that provide for the new construction of affordable multi-family rental housing developments,
3 many of which include a wide array of supportive services, for income-restricted Californians
4 earning between 15% and 60% of the Area Median Income for the County in which the project is
5 being built. My job duties include preparing complex Notices of Funding Availability (NOFAs);
6 reviewing, scoring, and underwriting complex applications on which award funding decisions
7 are made; preparing Standard Agreements between project sponsors and the State; managing the
8 complex construction loan closing process; preparing detailed project setups in anticipation of
9 disbursing awarded funds; facilitating the disbursement of funds, based on a percentage of
10 completion process; managing the permanent loan conversion process; and ultimately turning
11 over management of the project for long-term (55-year) monitoring. Throughout this multi-year
12 effort, I work closely with project sponsors to ensure successful delivery of thousands of
13 affordable housing units to the people of California.

14 6. HUD is involved from the inception of a project to its conclusion and regulates all
15 aspects of the project delivery lifecycle. For instance, HUD regulations dictate the project
16 application and award processes. Additional federal rules and regulations govern project
17 development, including but not limited to environmental reviews, recordkeeping and reporting
18 requirements, property standards, and periodic disbursement of funds. Even after construction is
19 complete, there is a federally-mandated feasibility period during which HUD requires multi-
20 decade monitoring activities involving tenant selection policies, lease requirements, and records
21 retention.

22 7. If a question or issue arises at the local project or state level, HCD staff might
23 need to escalate it through HUD. Questions can span a wide variety of complex policy areas
24 including, but not limited to, environmental review, labor or procurement standards, fair housing
25 regulations, and more. The speed with which a new project can be delivered can often depend
26 upon how quickly salient issues can be addressed by HUD staff.

8. In addition, HCD, like every other state housing and community development department in every state across the country, also relies on HUD databases and reporting systems, such as the Integrated Disbursement and Information System (IDIS), to facilitate HUD programs. IDIS is a real-time online database that our department uses to manage and draw down funds and record performance of federally funded projects. HUD also uses information inputted into IDIS to provide reports to Congress and to monitor grantees. In short, IDIS is essential to managing and completing DFFA projects.

9. I have seen reporting that indicates the Trump administration plans to lay off nearly half of HUD's staff, which has already been reduced in recent months, and close dozens of HUD field offices.¹ In my opinion, HUD's existing capacity is already insufficient to meet the national housing crisis. Eliminating nearly half of HUD's staff and closing field offices will critically impair and imperil crucial functions and services.

10. By drastically reducing HUD's capacity and functionality, these staffing cuts and office closures will irreparably harm SEIU Local 1000 bargaining unit members and California residents, particularly those in rural areas, who rely on HUD to help administer affordable housing programs in one of the most expensive states in the nation.

11. Fewer HUD staff means slower response times. Slower response times will have cascading effects that can jeopardize entire awarded projects. For example, there are stringent federal regulations to which we must adhere with regard to how quickly a project must be placed in service and to how quickly funds must be fully disbursed. Because DFFA projects operate on shoestring budgets to begin with, construction comes to a halt when fund disbursements are delayed. Even short delays can up-end budgets due to interim construction cost increases or interest accrual on multi-million-dollar projects, which then require project sponsors to seek out

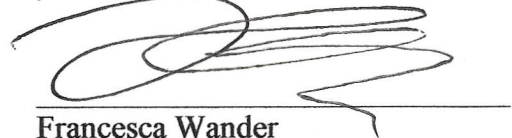
¹ See, e.g., Ben Metclaf, *Implications of Further HUD Staffing Cuts on the Housing Sector*, Turner Ctr. For Hous. Innovation, UC Berkeley (Mar. 13, 2025), available at <https://turnercenter.berkeley.edu/blog/implications-of-further-hud-staffing-cuts-on-the-housing-sector/#:~:text=Recent%20reporting%20suggests%20that%20the,headcount%20but%20not%20like%20this.>

1 other funding sources to make up the shortfall. If funds are not fully disbursed or the project not
2 placed in service within the HUD-mandated periods, HCD can be required to return the entire
3 amount of funds awarded to the project, including those funds already disbursed before
4 construction was delayed, resulting in potentially catastrophic losses to the project and the loss of
5 critically needed housing to the residents of California.

6 12. Fewer HUD staff will also mean the loss of critical technical expertise and
7 assistance, which will likewise have a detrimental impact on my work and the work of other
8 SEIU Local 1000 bargaining unit members. For instance, IDIS is crucial to every single DFFA
9 project. If the functionality of IDIS is compromised due to the lack of technical support or
10 maintenance, that would be catastrophic to our project management and would undoubtedly stall
11 or endanger projects. Staffing cuts will also diminish the agency's ability to enforce and oversee
12 enforcement of federal laws, including the National Environmental Policy Act (NEPA) and the
13 Fair Housing Act.

14 13. California's housing crisis is a solvable problem, but only through the partnership
15 between local, state, and federal government. Because DFFA's projects are funded and
16 administered entirely by HUD, virtually every aspect of my division's work will be impacted by
17 HUD's staffing cuts and office closures. If these actions are not blocked, our jobs will be
18 immeasurably more difficult. And the housing crisis in California will be exacerbated, not just
19 for low-income residents but for every California resident.

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21 I declare under penalty of perjury under the laws of the United States that the foregoing
22 is true and correct. Executed April 27, 2025, in Sacramento, California.

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Francesca Wander